



Date: August 3, 2006

To: WDB Directors
Job Service Directors
Job Service Supervisors
ASSET User Group Representatives

From: Gary Denis
Acting Bureau Director
Bureau of Workforce Programs

Subject: **WIA Policy Update 06-03: Definition of Participant and Exiter for U.S. DOL Employment and Training Programs**

Purpose

This provides guidance to Workforce Development Boards (WDBs), Job Service staff and Trade Adjustment Assistance (TAA) program directors regarding the definition of a participant and exiter in all U.S. Department of Labor (U.S. DOL) Employment and Training programs that are covered under its common measures policy. These definitions are used to determine how individuals are reported in Federally required program and performance reports, program performance measures and in the Automated Systems Support for Employment and Training (ASSET) System.

Legislative/Regulatory References

- Training and Employment Guidance Letter (TEGL) 17-05: Common Measures Policy for the Employment and Training Administration's (ETA) Performance Accountability System and Related Performance Issues
- Workforce Investment Act 20 CFR s. 666

Background

The U.S. Department of Labor (U.S. DOL) issued its final guidance for performance measure reporting on February 17, 2006. This policy rescinded previously issued TEGLs 7-99; 6-00; 6-00, Change 1; and 28-04, and established new definitions for program participation and exit in Workforce Investment Act (WIA) Title 1, WIA Title 3 and TAA.

Many job seekers visit Wisconsin's Job Centers each year and receive a variety of services ranging from self-service and informational activities to training services. The

programs that support Job Center infrastructure, resources and service delivery are bound by different definitions and terminology which makes a common language and common measurement structure difficult to accomplish. In the past, the Division of Workforce Solutions (DWS) has tried to create distinctions to define the process by which individuals move from one level of service to another within these differing program definitions, which has added to the confusion. Previous attempts to define, categorize and classify our customers as part of defining a service delivery process create complexity, which we believe defeats U.S. DOL's intent in creating a common measures policy that emphasizes consistency among program definitions.

TEGL 17-05 refers to customers as "participants" and "exiters", and DWS has adopted this same terminology. This guidance streamlines the definitions to align program and performance reporting requirements across several U.S. DOL-administered employment and training programs. U.S. DOL is moving its programs toward a common point of entry and exit. This move cannot be accomplished under the current WIA statute and regulations. Because each program has different eligibility and service delivery requirements, the point at which an individual becomes a "participant" for purposes of Federal reporting and performance measurement varies, depending on the customers' needs and the programs that provide services to them.

DWS has implemented the common exit component, since the functionality to do this currently exists in ASSET. Adjustments will be made to ASSET to accommodate items that must be reported at exit such as National Emergency Grants (NEG) placements, youth education status and exit reasons.

This policy update provides context for the definitions within each program and gives program managers a matrix (Attachment 2) to show how type of service, program providing the service, fund source paying for the service and completion of services apply in Federal reports and computing performance measures.

In general, the following definitions apply to the programs identified above:

ASSET means the Automated Systems Support for Employment and Training system. This is Wisconsin's designated customer reporting and data collection system for WIA Title 1, WIA Title 3 and TAA. It is the source for most participant and service delivery information that is reported to the U.S. DOL.

Exiter means a participant has not received a service funded by U.S. DOL programs or funded by a partner program for 90 consecutive calendar days. The exit date is the last date of service.

Funded by the Program means that WIA Title 1, WIA Title 3 and/or TAA funds were used to pay for the service. This includes Job Center resources and services that are supported through a mix of these programs' funds.

Individual means any person who has accessed services under the programs covered by this policy at a Job Center, affiliate site or through electronic technologies. Local boards, program staff and service providers may refer to these individuals as "customers," "registrants" or "applicants," but they are all "individuals" for purposes of this policy.

Participant means an individual who is determined eligible to participate in any program and receives a service funded by that program in either a physical location (One-Stop Job Center or affiliate site) or remotely through electronic technologies. Eligibility requirements vary among the programs, so further definition is provided below, as necessary to establish differences between program reporting and performance measurement.

Participation Date means the date an individual who meets a specific program's eligibility requirements begins receiving a service funded by that program. The participation date is variable because each program's eligibility requirements and service/performance definitions are different.

Partner Program means the WIA Mandatory One-Stop Service Delivery (See Attachment 1).

Self-Service and Informational Activities means any service listed in ASSET as a "Core Self or Informational" service.

Staff-Assisted Service means any service listed in the "Core Services Staff-Assisted" menu in ASSET.

Staff-Assisted Service or Better means any service in the ASSET service menus other than Core Self or Informational services.

Youth Service means any service in the ASSET Youth service menu.

Policy

Program Participation

When multiple WDBs provide services to participants, the WDB that enters the first staff-assisted service or its equivalent, as defined below, will be the WDB that receives performance credit for all applicable program performance measures. Attachment 2 shows the participation point and performance measure entry point for each fund source covered by this policy.

The Labor Exchange Program (WIA Title 3 - Wagner Peyser) funds many of the self-service and informational activities in Wisconsin's Job Centers. Services are available

to all individuals, hence there are no eligibility requirements. Any individual who visits the Job Center and uses available services such as the Resource Room in person or accesses its services electronically is a Wagner Peyser "participant" under the Federal definition. Participants become part of the WIA Title 3 performance measures when they use JobNet and print off a job referral or receive a staff-assisted service. A participant also will be counted in Labor Exchange performance measures if a staff person manually records the service in ASSET. A participant who uses JobNet, does not print out a job referral and uses only self-service or informational activities at the job center will be reported as "self-service" only.

The Veterans program is open to "veterans or other eligible individuals" and is based on a determination of eligibility as defined in Federal regulations (WIA Title 1, WIA Title 3 and Title 38 or the Veterans Employment and Training Program). Individuals who meet the definition of veteran, have been determined eligible for the program and receive self-service or informational activities only are Labor Exchange participants. When a veteran or other eligible individual receives a staff-assisted service from a Local Veterans Employment Representative (LVER) or Disabled Veterans Outreach Program (DVOP) specialist, he/she becomes a Veterans Program "participant" and is counted in the Veterans Program performance measures.

The TAA Program is open to individuals based on a determination of eligibility as defined in Federal regulations (Trade Act of 2002, Public Law 107-210). Individuals who meet the eligibility requirements and receive a service that is TAA funded are "participants" and will be reported in the TAA performance measures. Individuals who are determined eligible for TAA, but do not receive a service that is TAA funded are not TAA participants. They may be participants in other programs, depending on the service fund source(s).

The WIA Title 1 program has three (3) program areas that are open to adults, dislocated workers, and youth (ages 14 - 21), based on a determination of eligibility as defined in Federal regulations. Since each program area has its own funding stream, program participation and performance reporting is dependent upon the program area(s) for which an individual is determined eligible. When an individual receives services from more than one program area, the earliest service date will be used to establish the participation date.

- Because JobNet is supported by both WIA Title 1 and WIA Title 3 funds, any individual who is eligible for WIA Title 1 programs and uses JobNet is a Labor Exchange participant who will be counted as a "self-service only participant" in WIA Title 1 Federal reports. These individuals are not counted in the WIA Title 1 performance measures, even though they are referred to as "participants." They are, however, counted in the Labor Exchange performance measures.
- Case management is no longer a service that places a participant into performance measures. Case management services will prevent an exit from

occurring. Case management is not intended to be a standalone service so case managers should not extend the service planned end date simply to prevent an exit from occurring, unless other services are also being provided. This will be monitored by DWS performance staff and local program liaisons.

- Adults who meet the eligibility requirements for the adult program and receive a staff-assisted service or better that is funded by the WIA Title 1 Adult program are "participants" and will be reported in the WIA Title 1 Adult performance measures.
- Dislocated Workers who meet the eligibility requirements for the dislocated worker program and receive a staff-assisted service or better that is funded by the WIA Title 1 Dislocated Worker program are "participants" and will be reported in the WIA Title 1 Dislocated Worker performance measures. The participation date for dislocated workers who also receive services from either a National Emergency Grant or a Special Response Grant is the WIA Title 1 Dislocated Worker participation date.
- Youth (ages 14-21) who meet the eligibility requirements for the youth program and receive a youth service other than Design Framework Case Management, Design Framework Assessment or Design Framework Individual Service Strategy are "participants" and will be reported in the WIA Title 1 All-Youth performance measures. Younger Youth (ages 14-18) who meet these conditions will be reported in the three Younger Youth performance measures. Older Youth (ages 19 - 21) who meet these conditions will be reported in the four Older Youth performance measures. Age on the date of participation determines if the youth is in the older or younger youth cohort.

Note: The All-Youth Literacy/Numeracy Gains measure for out-of-school, basic skills deficient youth is tied to the date of first youth service. If a youth is receiving services from other programs or program areas within WIA Title 1 in addition to the Youth Program, the WIA date of first youth service may be different from the WIA Title 1 participation date.

Program Exit

Participants will be exited if they have not received a service funded by the WIA Title 1, WIA Title 3 and/or TAA programs, or partner programs, for 90 consecutive calendar days. A list of partner programs is included in Attachment 1. Beginning in Program Year 2006 (PY06), all exits will be managed by ASSET using the soft exit functionality, which complies with U.S. DOL policy. Participants will not be exited if:

- Services continue to be reported in ASSET,
- A planned gap in service is reported, or
- Services, other than follow-up services, are reported and have an actual start date listed.

Case managers and program operators must not prevent program exits by extending service dates or opening new services unless they can demonstrate that they are actively serving the participant. A participant who withdraws from or drops out of the program will be exited using ASSET's soft exit functionality.

ASSET Reporting

The timeline for making necessary changes to ASSET has not been finalized. Effective July 1, 2006, once all services have been closed, participants should be exited by the ASSET system using the automated soft exit function whenever possible. The exit date will be the same as the Actual Close Date for the last service provided by any program or partner program included in this policy and Attachment 1, to the extent that partner programs are tracked in ASSET. If an Actual Close Date has not been entered, then the Planned Service End Date will be used. The Follow-Up Services edit checks will be relaxed to permit entry of follow-up services before the automated exit has been executed.

If a participant's status or outcome at the point of exit is a factor in a performance measure or is a project/grant reporting requirement, then case managers should proceed with reporting the exit information as they have always done until all necessary changes have been made to the ASSET.

The following are known circumstances and programs or program areas for which a "hard exit" will need to be entered:

1. Application of an exclusion as an exit or inactivation reason - WIA Title 1 Adult, Dislocated Worker and Youth; National Emergency Grants; Special Response Grants; TAA and WIA Title 3, including Veterans.
2. Education Status at Exit - WIA Title 1 Youth.
3. Recalled by Layoff Employer - TAA
4. Employed at Exit - National Emergency Grants and Special Response Grants.
5. Participants whose services end on June 30, 2006 and will not be carried over into the new program year.

Note for TAA exits: If a "hard exit" is entered because of an exclusion or because of recall to the layoff employer, it will also be necessary to complete the two fields related to "TAA approved training" in order to save the exit screen.

If the participant does not fall into one of these categories, the case manager can simply close all services and wait for the soft exit to occur. The on-line ASSET Soft Exit Warning and Soft Exit reports can be used to monitor participants who are scheduled to exit soon and to determine which participants have been exited.

Action Required

This policy is effective July 1, 2006. If you have questions about this policy update, please contact your Local Program Liaison.

Attachments

cc: Dianne Reynolds, WIA Section
Local Program Liaisons
WIA Policy staff

Attachment 1

WIA Mandatory One-Stop Service Delivery Partners

- Adult, Dislocated Worker and Youth (WIA Title I)
- Adult Education and Family Literacy (WIA Title II)
- Job Service - Labor Exchange (Wagner Peyser WIA Title III)
- Vocational Rehabilitation (WIA Title IV)
- Temporary Assistance to Needy Families/WI W-2 (Added by the Governor)
- Food Stamp Employment & Training and Food Stamp Workfare
- Senior Community Service Employment Program (Older Americans Act)
- Carl D. Perkins Vocational and Applied Technology Education
- Trade Adjustment Assistance (and NAFTA-TAA)
- Veterans Employment & Training Service and local veteran's outreach programs
- Community Services Block Grants
- Housing and Urban Development Employment and Training Activities
- Unemployment Insurance
- W-2 Employment and Training Services

If present in the WDA:

- Native American Programs
- Migrant and Seasonal Farm Worker Programs
- Job Corps
- Youth Opportunity Grants
- Veterans Workforce Investment Program (WIA Title 1, Section 168)
- Housing and Urban Development Employment and Training Activities
- Unemployment Insurance
- W-2 Employment and Training Services